

Application No. 10/730,137
Amendment dated 6 February 2006
Reply to Office Action of 5 October 2005

Page 6 of 10

REMARKS

In this paper, the Applicant has amended claims 5 and 17. These amendments are submitted to be supported by the application as originally filed and to add no new matter.

Claims 1-19 are pending after this amendment.

Claims 17-19 - Allowable Subject Matter

The Examiner has indicated that claims 17-19 would be allowable if rewritten in independent form to include all of the limitations of their base claim and any intervening claims. The Applicant has done this by amending claim 17 to include the features of claim 5. Accordingly, the Applicant submits that claim 17 is in condition for allowance. Claims 18 and 29 depend from claim 17 and are submitted to be allowable for at least this reason.

Claims 1-3

The Office Action has raised the combination of EP 0985528 (Okamura), US 5488906 (Iron et al.) and US 3677059 (Miller et al.) in connection with claims 1-3. The Applicant submits that claims 1-3 patentably distinguish the combination of Okamura, Iron et al. and Miller et al.

The Examiner contends (on page 2 of the Office Action) that Okamura describes a method and apparatus for exposing processless printing plates. This contention is false. Okamura fails to disclose processless plates. More particularly, Okamura does not teach or suggest "exposing a processless plate in a computer-to-plate platesetter" or "forming a sharp bend along one edge of the plate inside said computer-to-plate platesetter without developing the plate" as recited in claim 1.

As discussed previously in the Applicant's Response dated 21 December 2004, Okamura discloses a plate making system "wherein a plate feeder, an exposure unit and a developer are linearly arranged, ... [and] wherein there are provided on the downstream side of the developer ... a first bender for forming bends ..." (see col. 2, ln. 27-46). The Okamura developer (5) "has within a case 32, a heater 33, developer 34, rinser 35, rubber coater 36 and dryer 37 as shown in Fig. 3. In this unit, the latent image formed in the exposure unit 3 is heated by the heater 33 and fixed on the printing face on the plate and

Application No. 10/730,137
Amendment dated 6 February 2006
Reply to Office Action of 5 October 2005

Page 7 of 10

then the high sensitive photopolymer layer other than the fixed images is removed with alkaline solution to form a printing face. The plate material is then rinsed in the rinser 35 and put to protective treatment such as coating with rubber in the rubber coater 36." (see col. 7, ln. 27-36).

These aspects of the Okamura system clearly require that imaged plates be processed in the developer (5). Accordingly, Okamura fails to teach or suggest that the plates are "processless" or that the plates are bent "without developing the plate" as recited in claim 1. Furthermore, Okamura explicitly teaches away from the use of "processless" plates, since there would be no need to pass processless plates through a developer.

The Applicant submits that neither Iron et al. nor Miller et al. remedy this deficiency.

Iron et al. disclose an internal drum printing plate plotter that has a loading tray (24) for smoothly imparting an overall curve to a printing plate to facilitate loading the printing plate into a drum (21). Iron et al. expressly indicate that creasing of the plate is avoided (see col. 3, ln. 41-42). Iron et al. fail to disclose or suggest that exposure or bending takes place in a computer-to-plate platesetter. Accordingly, Iron et al. expressly teach away from "exposing a processless plate in a computer-to-plate platesetter" and "forming a sharp bend along one edge of the plate inside said computer-to-plate platesetter without developing the plate" as recited in claim 1.

The Applicant submits further that it would not be obvious to modify the Iron et al. internal drum plotter to provide a plate with a "sharp bend" as recited in claim 1. A plate having a sharp bend would prohibit the operation of guides (40) and/or rollers (100) used to load the plate into and out of the Iron et al. plotter (see Figures 3A, 3B, 9 and 10).

Miller et al. disclose a semiautomatic machine for simultaneously bending the leading and trailing edges of a lithographic printing plate. The Miller et al. machine is a separate plate bending machine for bending conventional lithographic printing plates after exposure and development. The Miller et al. machine does not contemplate "exposing a processless plate in a computer-to-plate platesetter" or "forming a sharp bend along one edge of the plate inside said computer-to-plate platesetter without developing the plate" as recited in claim 1. Miller et al. expressly teach away from these claim 1 features by stating "a photosensitive plate of aluminum is exposed to a photographic image which causes

Application No. 10/730,137
Amendment dated 6 February 2006
Reply to Office Action of 5 October 2005

Page 8 of 10

portions of the photosensitive material to become solvent insoluble. Following exposure the plate is washed with a solvent to remove the soluble portion and to prepare the printing image" (see at col. 1, ln. 1-10) and "in view of the solvents used to prepare the printing plates and the resultant explosive vapors which are present, it is far safer to use a pneumatic drive than a similar electric motor drive" (see col. 5, ln. 74 to col. 6, ln. 2). Accordingly, Miller et al. teach away from "exposing a processless plate in a computer-to-plate platesetter" and "forming a sharp bend along one edge of the plate inside said computer-to-plate platesetter without developing the plate" as recited in claim 1.

Based on this reasoning, the Applicant respectfully submits that claim 1 patentably distinguishes the combination of Okamura, Iron et al. and Miller et al. Claims 2 and 3 depend from claim 1 and are submitted to be patentable over the combination of Okamura, Iron et al. and Miller et al. for at least this reason.

Claims 4, 7-9 and 11-14

The Office Action raises the combination of Okamura, Iron et al. and Miller et al. in connection with claims 4, 7-9 and 11-14. The Applicant submits that claims 4, 7-9 and 11-14 patentably distinguish the combination of Okamura, Iron et al. and Miller et al.

The Examiner expresses the view (at p. 3 of the Office Action) that Okamura teaches a method of "bending (elements 9, 10) processless plates inside a computer-to-plate platesetter". This assertion is false. Okamura fails to disclose processless plates. More particularly, Okamura does not teach or suggest the claim 4 feature of "forming a sharp bend along one edge of a first processless plate inside a computer-to-plate platesetter without developing the plate".

As discussed above in connection with claim 1, Okamura clearly requires the development of printing plates in a developer (5). Accordingly, Okamura fails to teach or suggest that the plates are "processless" or that the plates are bent "without developing the plate" as recited in claim 4. Furthermore, Okamura explicitly teaches away from the use of "processless" plates, since there would be no need to pass processless plates through a developer.

As discussed further above, neither Iron et al. nor Miller et al. remedy this deficiency.

Application No. 10/730,137
Amendment dated 6 February 2006
Reply to Office Action of 5 October 2005

Page 9 of 10

Based on this reasoning, the Applicant submits that claim 4 patentably distinguishes the combination of Okamura, Iron et al. and Miller et al. Claims 7-9 and 11-14 depend from claim 4 and are submitted to be patentable over the combination of Okamura, Iron et al. and Miller et al. for at least this reason.

Claims 10, 15 and 16

The Office Action raises the combination of Okamura, Iron et al., Miller et al. and EP 0950925 (Nakayama et al.) in connection with claims 10, 15 and 16. The Applicant submits that claims 10, 15 and 16 patentably distinguish the combination of Okamura, Iron et al., Miller et al. and Nakayama et al.

Claims 10, 15 and 16 depend from claim 4. As discussed above, the combination of Okamura, Iron et al. and Miller et al. fails to teach or suggest the claim 4 feature of "forming a sharp bend along one edge of a first processless plate inside a computer-to-plate platesetter without developing the plate. The Applicant submits further that Nakayama et al. fail to remedy this deficiency.

Nakayama et al. describe a platemaking apparatus for making plates of a highly flexible material such as plastic film or paper cut from a roll. Nakayama et al. do not disclose or suggest forming a sharp bend along an edge of a printing plate as recited in claim 4. There would be no reason to form such a bend in the Nakayama et al. context, nor is it clear that the highly flexible materials used by Nakayama et al. would take such a bend.

Based on this reasoning, the Applicant submits that claims 10, 15 and 16 patentably distinguish the combination of Okamura, Iron et al., Miller et al. and Nakayama et al.

Claims 5 and 6

The Office Action raises the combination of Okamura, Nakayama et al. and Miller et al. in connection with claims 5 and 6. The Applicant submits that claims 5 and 6 patentably distinguish the combination of Okamura, Nakayama et al. and Miller et al.

Claim 5 recites "an automatic plate bender positioned adjacent to an imaging system to receive imaged printing plates directly from said imaging system, the automatic plate bender configured to form a sharp bend along at least one edge of an imaged printing

Application No. 10/730,137
Amendment dated 6 February 2006
Reply to Office Action of 5 October 2005

Page 10 of 10

plate." As discussed above, Okamura and Miller et al. fail to contemplate processless printing plates. The technology described by Okamura and Miller et al. requires that exposed plates be processed in a developer after imaging. A plate must be flat for processing; consequently, it is not possible to form bends in a printing plate prior to processing. Accordingly, the combination of Okamura and Miller et al. does not describe or suggest a plate bender that is positioned to "receive imaged printing plates directly from said imaging system" wherein "the automatic plate bender [is] configured to form a sharp bend along at least one edge of an imaged printing plate" as recited in claim 5. Nakayama et al. fail to remedy this deficiency.

Based on this reasoning, the Applicant submits that claim 5 patentably distinguishes the combination of Okamura, Nakayama et al. and Miller et al. Claim 6 depends from claim 5 and is submitted to be patentable for at least this reason.

Conclusions

In view of the amendments and comments presented above, the Applicant submits that all of the pending claims of this application are in condition for allowance and respectfully requests reconsideration and allowance of this application.

Respectfully submitted,
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